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Attorneys for Defendant
Sentinel Insurance Company

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

WELLNESS HOLDINGS, LLC, an
Oregon Limited Liability Company,

Civil No.

Plaintiff,

NOTICE OF REMOVAL

v.

SENTINEL INSURANCE COMPANY,
LTD., a foreign corporation,

Defendant.

TO: The Clerk of the Court, United States District Court for the District of
Oregon

Pursuant to 28 USC §1441 and 1446, Defendant Sentinel Insurance
Company, Ltd. ("Sentinel") removes this action from the Circuit Court of the
State of Oregon, for the County of Deschutes, to the United States District
Court for the District of Oregon in Eugene, Oregon.

1. On or about September 11, 2018, Sentinel was provided with a Summons and Complaint that had been filed in the Circuit Court of the State of Oregon, for the County of Deschutes, Case No. 18CV39241. Copies of the Summons and Complaint are attached hereto as Exhibits 1 and 2, respectively, and constitute all process, pleadings, and orders served on defendant in that action up to the present date.
2. Pursuant to 28 USC § 1441(a), a party may remove an action filed in the state court to the United States District Court if the district court has original jurisdiction over the action. This action is one over which the court has original jurisdiction under 28 USC § 1332(a)(1) because:
 - (1) The amount in controversy exceeds \$75,000; and
 - (2) Defendant is not a citizen of the state in which the action was brought.

Defendant Sentinel Insurance Company, Ltd. is organized and incorporated under the laws of the state of Connecticut with its principal place of business in Connecticut.

3. The amount in controversy in this action exceeds \$75,000 in that Plaintiff seeks, among other things, \$705,102.02 in damages.
4. Removal is timely in that fewer than 30 days have elapsed since a copy of the Summons and Complaint was first provided to Sentinel 28 USC § 1446(b).
5. This notice is filed pursuant to Fed.R.Civ.P. 11.

WHEREFORE, Sentinel removes this action from the Circuit Court for the State of Oregon, for the County of Deschutes to the Eugene Division of the United States District Court, for the District of Oregon.

DATED: October 9, 2018

MALONEY LAUERSDORF REINER, PC

By /s/ Francis J. Maloney

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